

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

GOLDI Y. CAPALUNGAN

:

Petitioner,

:

Case No.:

2:18-cv-1276

Judge:

Smith

vs.

:

Magistrate Judge:

Jolson

EMMANUEL R. LEE

:

Respondent.

:

**PETITIONER, GOLDI Y. CAPALUNGAN'S, DISCLOSURE OF WITNESSES**

Now comes the Petitioner, Goldi Y. Capalungan, by and through Counsel, and hereby submits her disclosure of witnesses pursuant to the Court's Order dated March 28, 2019:

(1) **Goldi Y. Capalungan-On Direct Examination**

**Expected Testimony:** The Petitioner is expected to provide testimony with respect to the determination of the habitual residency of the minor child pursuant to the filing of the Hague Petition.

(2) **Emmanuel R. Lee-On Cross Examination**

**Expected Testimony:** The Respondent is expected to provide testimony with respect to the determination of the habitual residency of the minor child and any applicable defenses pursuant to the Hague Convention.

(3) **Mary Ann Joy R. Lee-On Cross Examination**

**Expected Testimony:** Ms. Lee is expected to provide testimony with respect to the determination of the habitual residency of the minor child and any applicable defenses pursuant to the Hague Convention. Ms. Lee is the aunt of the minor child and sister of the Respondent.

Respectfully Submitted:

GARY J. GOTTFRIED, CO., L.P.A.

/s/ Gary J. Gottfried  
Gary J. Gottfried (0002916)  
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**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing Petitioner's Disclosure of Witnesses was served upon Gregg Lewis, Attorney for Respondent by way of email correspondence on this 29<sup>th</sup> day of May, 2019.

/s/ Gary J. Gottfried  
Gary J. Gottfried (0002916)  
Counsel for Petitioner